

**Comments in Response to Localism Notice of Proposed Rulemaking
MB Docket No. 04-233**

I am a Christian and am consistently encouraged by the ministry of my local K-Love radio station. As a result, I am joining my voice with those of others who are similarly encouraged and uplifted by the music ministry of K-Love to comment on the recent proposed rules from the FCC.

The K-Love radio station and other Christian stations like it are attempting to bring messages of hope, peace, and encouragement to a world that faces despair, heartache, discouragement, and emptiness. It sometimes can be overwhelming when one considers the state our world is in and the difficulties we face every day. Many of those difficulties are in the form of racism, sexism, and ageism. Through K-Love, I am reminded and I daresay others are as well, of how connected we are and how much love and hope there is in this world, despite how it might sometimes appear.

The rules being proposed by the FCC will place constraints on K-Love and other Christian radio stations that will impede their ability to focus on their music and ministry. The public interest in the Christian community of having positive programming outweighs the government interest of tighter regulation over our radio airwaves.

Please seriously consider the comments provided during this comment period and modify the proposed rule to reflect more concern for the work that radio stations like K-Love are doing to provide encouraging, uplifting music ministry to our communities.

I submit the following comments in response to the Localism Notice of Proposed Rulemaking (the "NPRM"), released Jan. 24, 2008, in MB Docket No. 04-233.

Any new FCC rules, policies or procedures must not violate First Amendment rights. A number of proposals discussed in the NPRM, if enacted, would do so – and must not be adopted.

(1) The FCC must not force radio stations, especially religious broadcasters, to take advice from people who do not share their values. The NPRM's proposed advisory board proposals would impose such unconstitutional mandates. Religious broadcasters who resist advice from those who don't share their values could face increased harassment, complaints and even loss of license for choosing to follow their own consciences, rather than allowing incompatible viewpoints to shape their programming. The First Amendment prohibits government, including the FCC, from dictating what viewpoints a broadcaster, particularly a religious broadcaster, must present.

(2) The FCC must not turn every radio station into a public forum where anyone and everyone has rights to air time, particularly when other mediums for such discussion are available. Proposed public access requirements would do so – even if a religious broadcaster conscientiously objects to the message. The First Amendment forbids imposition of message delivery mandates on any religion.

(3) The FCC must not force revelation of specific editorial decision-making information. The choice of programming, especially religious programming, is not properly dictated by any government agency – and proposals to force reporting on such things as who produced what programs would intrude on constitutionally-protected editorial choices. The FCC has not indicated in its Statement of Basis and Purpose what use it will derive from the reports, how decisions will be made using the reports, who will have access to the reports, or concern for the undue burden and cost the development of the reports will have on radio stations.

(4) The FCC must not establish a two-tiered renewal system in which certain licensees would be automatically barred from routine renewal application processing. The proposed mandatory special renewal review of certain classes of applicants by the Commissioners themselves would amount to coercion of religious broadcasters. Those who stay true to their consciences and present only the messages they correspond to their beliefs could face long, expensive and potentially ruinous renewal proceedings.

(5) Many Christian broadcasters operate on tight budgets, as do many smaller market secular stations. Keeping the electricity flowing is often a challenge. Yet, the Commission proposes to further squeeze niche and smaller market broadcasters, by substantially raising costs in two ways: (a) by requiring staff presence whenever a station is on the air and, (b) by further restricting main studio location choices. Raising costs with these proposals would force service cutbacks – and curtailed service is contrary to the public interest. The FCC has not indicated how having a person on the premises will meet its proposed objectives.

We urge the FCC not to adopt rules, procedures or policies discussed above.

__R. Romona Jackson____

Signature

Name

Title (if any)

Organization (if any)

__April 27, 2008_____
Date

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